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TIMOTHY B. FLEMING
OF COUNSEL

January 2, 2019

Via ECF and Federal Express

The Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Sarah Netburn
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN)

Dear Judge Daniels and Magistrate Judge Netburn:

The undersigned is one of the attorneys representing the plaintiffs in the following case filed this day against the Islamic Republic of Iran and fifteen of its political subdivisions, agencies and instrumentalities:

- *Ray, et al. v. Islamic Republic of Iran*, No. 1:19-cv-00012

On December 7, 2018, after a telephone conference, the Court issued an endorsed order authorizing this filing of a long form complaint, similar to the pleadings in *Havlisch, et al. v. bin Laden, et al.*, 03-cv-09848 (GBD)(SN), and *Hoglan, et al. v. Iran, et al.*, 1:11 Civ. 7550 (GBD)(FM). I note that there are more plaintiffs in *Ray* than I indicated during that telephone conference. That is only because several families and individuals, some through other counsel, signed on to join the case after that telephone hearing and the resulting endorsed order. The number of plaintiffs in the *Ray* case is still many fewer than the 100 plaintiffs permitted under the short form complaint form.

The *Ray* case is expected to be assigned to Judge Daniels as possibly related to the Multi-District Litigation 1:03-md-01570-GBD-SN (the “MDL”). In accordance with the letter and spirit of the July 10, 2018 Amended Order Approving Notices to Conform, Short Form Complaints, and Notices of Amendment (ECF 4045) in the MDL, I write respectfully to request that the *Ray* case be made part of the MDL *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN).

Respectfully Submitted,



Timothy B. Fleming
One of the Attorneys for the Ray Plaintiffs

cc: All MDL counsel (via ECF)

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